

EXHIBIT C

From: petersjoan <petersjoan@bellsouth.net>
Sent: Friday, May 16, 2025 1:55 PM
To: Andrew Brettler
Cc: Robert "Bob" L. Raskopf; Patricia M. Patino; Jake Camara; Joel Sichel; Kai Alblinger; Carlos A. Garcia Perez; Gustavo D. Lage
Subject: Re: Request for Meet and Confer/ Doe v. Bonnell

Although witness identities are not inherently confidential in many cases, in a CARDII case where the defendant is publicly streaming and doxxing, and witness intimidation and harassment are real and ongoing concerns, there are strong legal and equitable grounds for a protective order that includes the confidentiality of witness identities. I cannot think of any legitimate reason that your client would be opposed to keeping certain witnesses' identities confidential. We will proceed with filing a motion.

On Friday, May 16, 2025, 03:23:08 PM EDT, Andrew Brettler wrote:

Witness identifies are not inherently confidential. If you don't accept our changes, then you will have to make a motion.

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Andrew B. Brettler | BERK BRETTLER LLP
9119 Sunset Blvd. | West Hollywood, CA 90069
O: +1.310.278.2111 | M: +1.917.620.2726

On May 16, 2025, at 12:19 PM, petersjoan wrote:

Thank you, Andrew. I have reviewed your revisions and accepted them, except for the 2 items you deleted in paragraph 2. We cannot agree to excluding those 2 items. Is there a way you could rephrase them in a way that would be acceptable to both parties? It seems that protecting the identity of witnesses as well as confidential information that could cause harm is something both parties would support.
thanks,
Joan

On Friday, May 16, 2025, 01:13:40 PM EDT, Andrew Brettler wrote:

Joan, it's 10am. I marked up your proposed agreement and will send you our comments when I get out of my meeting.

Andrew B. Brettler | BERK BRETTLER LLP
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On May 16, 2025, at 10:10 AM, petersjoan wrote:

Based on your non-response, we consider our meet and confer efforts to reach a resolution on a joint protective order to be exhausted.

On Thursday, May 15, 2025, 07:40:40 PM EDT, petersjoan wrote:

Following up on this. Please let us know defendant's position by noon tomorrow.

On Wednesday, May 14, 2025, 02:20:02 PM EDT, Joan peters wrote:

Andrew:

As discussed in our meet and confer on May 12, attached is a draft of a proposed confidentiality agreement and protective order regarding discovery. This draft is marked Confidential, which means it is not to be made public or shared on social media by anyone including specifically your client. Please advise if you would like to move forward with a joint stipulated agreement - we are open to suggested edits.

thanks,
Joan

On May 8, 2025, at 9:48 PM, Joan peters <petersjoan@bellsouth.net> wrote:

Let's speak at 1 pm EST.
thanks.

On May 8, 2025, at 4:08 PM, Andrew Brettler
<abrettler@berkbrettler.com> wrote:

I can speak on Monday after 9:30 a.m. PDT.

Andrew B. Brettler | BERK BRETTLER LLP
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O: +1.310.278.2111 | M: +1.917.620.2726

On May 8, 2025, at 10:14 AM, Joan peters
<petersjoan@bellsouth.net> wrote:

Dear Counsel:

We are requesting a meet and confer to discuss a proposed stipulated confidentiality agreement and protective order pertaining to the responses to the parties' discovery requests. We are available to discuss tomorrow before 12:30 pm EST, or Monday flexible.

Please advise.

Thank you,
Joan